<center>**REMARKS**</center>

In the Office Action dated April 11, 2003, the rejections of Claims 1, 2, 4, and 5 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,327,590 ("Chidlovskii") were withdrawn. However, a new reference, i.e., U.S. Patent No. 6,366,915 ("Rubert"), was cited in combination with Chidlovskii and other combinations of patents in rejecting all of the claims as being unpatentable under 35 U.S.C. § 103.

Applicant has reviewed the Rubert reference in detail and does not believe it overcomes the deficiencies in the other references (as is explained below). Therefore, pending Claims 1-20 and 22 are not amended in this response and remain for consideration in the application. All the pending claims are believed to contain matter not shown by the references previously cited when considered alone or in combination with the newly-cited Rubert reference.

Rejections Under 35 U.S.C. § 103 of Claims 1-5

In the Office Action of April 11, 2003, Claims 1-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over Chidlovskii in view of Rubert. This rejection is respectfully traversed based on the following remarks.

Claim 1 is directed to a method for controlling access provided to a client to content files by <u>filtering what content is accessible</u> to a searching client and what content will be included in a search result. To this end, Claim 1 calls for "<u>creating a modified search request</u> by applying a search profile for the client to the received search request" then "routing the modified search request to a search engine having a search engine collections populated from the content files." Further, Claim 1 requires that the applying of the search profile includes "adding at least a portion of the search profile to the received search request to specify a set of the search engine collections to be searched by the search engine with the modified search request." Claim 1 calls for a filtering or limiting function to be provided by adding a portion of a search profile to a received search request to control what content is searched and what content is included in a search result. Such a control of access is not shown in the prior art, and Claim 1 is believed allowable.

Restating the prior Office Action, the April 11, 2003 Office Action cites Chidlovskii at Fig. 2 and col. 4, lines 19-25 for teaching the "creating a modified search request" element

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of Claim 1 (except for the "adding a least a portion of a search profile..." step). Applicant disagrees with this reading of Chidlovskii. In contrast to the claimed invention, Figure 2 of Chidlovskii shows a search pre-processor 30 in a meta-search engine 80 that uses a user profile 50 to **"to rank the results of a search query"** (see, col. 3, lines 23-30). Further, as cited in the Office Action at col. 4, beginning at line 16, Chidlovskii describes the pre-processor 30 as applying a predetermined user context to determine "the context of the query." This functioning of the pre-processor 30 is explained further at col. 8, lines 26-55 which explains that "the search pre-processor takes the query and processes the keywords in the query to a query profile...used by the search post-processor later" (i.e., to rank the results).

In other words, the pre-processor 30 acts to create a query profile used later to process the search results, and, hence, Chidlovskii fails to teach the Claim 1 limitation of "creating a modified search request" but instead teaches creating a query profile for use in ranking search results. Because Chidlovskii does not teach creating a modified search request as claimed, Chidlovskii cannot teach the limitation of Claim 1 of "routing the modified search request" to a search engine and no specific citation in Chidlovskii for routing a modified search request is provided in the Office Action. Since at least these two elements of Claim 1 are not shown, Claim 1 is allowable over Chidlovskii. Applicant notes that the April 11, 2003 Office Action did not respond to Applicant's prior remarks that Chidlovskii fails to teach the search request modification step.

Additionally, Chidlovskii fails to provide any teaching of "adding at least a portion of the search profile to the received search request" during the "creating a modified search request by applying a search profile ...to the received search request." The April 11, 2003 Office Action agrees that "Chidlovskii does not disclose" the applying step including the adding of at least a portion of a search profile to the received search request to specify a set of search engine collections. Rubert is said at Fig. 4, col. 2, lines 61-64 to disclose "determining the databases to access" and therefore, it would be obvious to modify Chidlovskii with Rubert to arrive at the invention of Claim 1. However, Rubert does not overcome the deficiencies of Chidlovskii. First, Chidlovskii fails to teach modifying a search request and passing the modified request to a search engine. Rubert also does not teach modifying a search request and hence, this element cannot be obvious in light of the combination of these references.

Second, Rubert does not disclose modifying a search request by "adding at least a

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portion of the search profile to the received request to specify a set of the search engine collections to be searched." At Figure 4 item 410, Rubert is teaching a step of receiving notification of a user identity but not of adding a portion of a profile to a search request to set which databases can be accessed by the user. Instead, turning to col. 2, lines 61-66, Rubert teaches a system using a user's identification to identify which databases can be accessed by the user and which queries can be executed. The Rubert system then "presents the user with available queries" and the user must select one of the queries. The searching is not transparent to the user with the submitted search request simply being modified to specify which databases are accessed, but instead queries are defined for the user including which databases and the user must actively select which queries (or forms, reports, and the like) they wish to receive.

Nothing in Rubert explicitly or implicitly suggests that the user is submitting a search request that is modified by adding something from the profile but instead the profile is used to identify the databases and how they may be queried – these are different processes. This can be seen at various locations in Rubert such as: (1) col. 4, line 3, "provides an interface with which the user can easily specify a query"; (2) col. 4, line 40, "the IR system then presents the user with these queries"; (3) col. 4, line 55, "After the user has finished specifying the query, the IR system then executes the query"; and (4) col. 5, line 53, "authorized report forms for Bob are shown in UI screen 100." Rubert's teachings when applied in the context of Applicant's invention would suggest on one skilled in the art that access to the content files 150 is requested and in response sets of the content files 150 are offered to the requestor along with a set of acceptable queries. Instead, the invention of Claim 1 calls for allowing the user to define the search request accept that a portion of a profile is added to define which search engine collections are accessed (not which content files). Rubert's teaching when combined with the teaching of Chidlovskii would not successfully lead to the claimed invention (nor even suggest all of the elements). Therefore, Claim 1 is non-obvious and allowable over Chidlovskii in view of Rubert.

Claims 2-5 depend from Claim 1 and are believed allowable for at least the reasons for allowing Claim 1. Additionally, Claim 4 calls for a set of search results to be received in a format defined by the search engine, and then the method involves "standardizing the set of search results." Chidlovskii is cited at col. 2, lines 49-60 for teaching such standardization for a variety of search engines but Chidlovskii at this point only discusses ranking the results

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and then displaying or providing the results. No discussion, and certainly no enabling description, is provided of how the results may be processed to standardize the results from differing search engines. For this additional reason, Claim 4 (and Claim 5 which depends from Claim 4) is believed non-obvious in light of Chidlovskii and Rubert.

Rejections Under 35 U.S.C. § 103 of Claim 6

In the Office Action of April 11, 2003, Claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over Chidlovskii in view of Rubert and further in view of U.S. Patent No. 6,360,215 ("Judd"). This rejection is respectfully traversed based on the following remarks.

Claim 6 depends from Claim 1, which Applicant believes to be an allowable independent claim. Additionally, Judd does not overcome the deficiencies of Chidlovskii and Rubert, and particularly does not teach modifying a search request as discussed above. Claim 6 further calls for "intercepting an indexing request from the search engine for a set of information ... and returning to the search engine a modified form of the requested set of information." Judd is cited at Fig. 1 for teaching these additional functions.

As stated in the last response "after reviewing Judd at Fig. 1 and at col. 5., line 62 to col. 8, line 29 where Fig. 1 is described, Applicant could find no teaching or suggestion that it may be desirable to intercept a search engine indexing or populating request by retrieving the requested data from a content store but yet returning a modified version of the retrieved data. This is useful for controlling how the search engine collections is populated (i.e., limiting access to content by the search engines), and thus, limiting access by clients who later submit search requests as the collection is different than the raw information in the content store." Claim 6 is believed allowable for this additional reason over the combination of Chidlovskii, Rubert, and Judd. Note, the April 11, 2003 Office Action did not respond to Applicant's remarks distinguishing the invention of Claim 6 from Judd, and hence, Applicant reasserts the previous argument and requests allowance of Claim 6 be reconsidered.

Rejections Under 35 U.S.C. § 103 of Claim 7-13

Additionally, in the Office Action of April 11, 2003, Claims 7-13 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,253,198 ("Perkins") in view of Rubert. This rejection is respectfully traversed based on the following remarks.

Independent Claim 7 is directed to a method for restricting access to content files by a

search engine that calls for "positioning a search engine interface between the client and the search engine, wherein the search engine interface is also positioned between the search engine and the content files." The search engine interface then receives "an indexing request from the search engine for a set of information from the content files." Significantly, the method further includes the two steps of "operating the search engine interface to retrieve the set of information from the content files" and then "**modifying content in the set of information with the search engine interface**." Hence, the method of Claim 7 requires that the search engine interface act as a intermediary between the search engine and the content files (no direct access provided as was the case in prior art systems) and is then able to control what "content" is returned to the search engine for use in "populating a search engine collections." Because all of these features are not shown or even suggested by the combination of Perkins and Rubert, independent Claim 7 is non-obvious based on these references.

The following remarks were provided in the last response and are believed to still differentiate Perkins from the method of Claim 7 (note, again, that the Office Action of April 11, 2003 stated that Applicant's arguments were moot based on the new rejections but failed to provide reasons why the still relevant arguments, such as how Perkins fails to teach claimed elements, were unpersuasive):

" Specifically, Perkins is cited at col., 1, lines 59-61 and col. 6, lines 1-3 for teaching positioning a search interface between a search engine and content files. However, Perkins teaches providing a standard interface such as a Common Gateway Interface (CGI) between the client (which sends the "query") and the search engine but not an interface between the search engine and the content files. Note, the "search engine database" described at col. 6, lines 1-3 is a search engine collections so this citation also discusses a CGI between a client and a search engine used for allowing a user to add to, modify, or delete information in the search engine collections (but not for controlling interactions between a search engine and content files used to populate the collections). Hence, the positioning step of Claim 7 is not shown or suggested.

Perkins is cited at col. 10, lines 27-67 for teaching operating the search engine interface to retrieve the set of information from the content files. However, at this point, Perkins is discussing how to update the search engine database and search engine index using a CGI program (i.e., which was positioned between the client and

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the search engine). There is no teaching that the search engine when populating its collections or database would go through a search engine interface that would retrieve information identified in an indexing request from content files (typically in a manner that is transparent to the search engine)."

The Office Action notes that Perkins does not teach modifying content in the retrieved set of information with the search interface engine but now cites Rubert at Figs. 6A-6B, 610, 615 (instead of the Christensen reference). Rubert provides no teaching of <u>modifying data retrieved from a content source prior to placing it in the search engine collections</u>, and hence, there would be no motivation to modify Perkins to arrive at the invention of Claim 7. More particularly, Rubert in the method shown in Figures 6A and 6B is discussing query execution and presenting report forms and query selections from a user (see items 610 and 615 in particular). Rubert does not discuss the populating of databases served by database servers 350, 352, 354 with an intermediary device like the search interface engine. Instead, Rubert teaches controlling access to the databases after they are created by only allowing certain queries to be selected by a user. The claimed invention in contrast provides protection of content in files 150 of Figure 1 by limiting what a search engine can access in creating search engine collections 166. This is a very different tactic in providing limited user access – in the claimed invention, some data is not even made available to the searching tool (such as the IR system 300 of Figure 3 in Rubert). For at least this reason, Claim 7 is believed allowable over the combination of Perkins and Rubert.

Claims 8-13 depend from independent Claim 7 and are believed allowable for the reasons for allowing Claim 7. Further, Claim 11 calls for modifying the search request by operating the search engine interface in a fashion similar to that described in Claim 1 to add a client search profile to a received search request to identify which portions of a search engine collections to apply the modified search request. Hence, Claim 11 and Claim 12 that depends from Claim 11 are allowable over these combined references for the additional reasons provided for allowing Claim 1.

Rejections Under 35 U.S.C. § 103 of Claim 14-20

Additionally, in the Office Action of April 11, 2003, Claims 14-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Judd in view of Rubert. This rejection is respectfully traversed based on the following remarks.

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Independent Claim 14 is directed to a web server with limitations similar to those of Claim 1 written in apparatus form. Hence, Claim 14 and Claims 15-17 that depend from Claim 14 are believed allowable at least for the reasons for allowing Claim 1.

Independent Claim 18 as amended includes limitation similar to that of the method of Claim 7 written in computer program and code devices language. Therefore, the reasons provided for allowing Claim 7 are applicable to Claim 18. Particularly, the computer program of Claim 18 includes code devices for creating a modified search request by applying a search profile which is not shown by Judd or Rubert. Further, the computer program includes code devices for intercepting an index request from the search engine and generating a restricted populating set of information by modifying the results of the indexing request. The search engine then uses this restricted set to populate the search engine collections. Rubert provides no teaching of limiting the population of its databases but instead limits a user's ability to query such databases. Hence, Claim 18 is believed allowable as non-obvious in light of Judd and Rubert. Claims 19 and 20 depend from Claim 18 and are believed allowable for the reasons for allowing Claim 18.

Rejections Under 35 U.S.C. § 103 of Claim 22

Additionally, in the Office Action of April 11, 2003, Claim 22 was rejected under 35 U.S.C. §103(a) as being unpatentable over Chidlovskii taken alone. This rejection is respectfully traversed based on the following remarks.

Chidlovskii is cited at Figures 1-2, col. 2, lines 49 to col. 3, line 6 for teaching all the elements of Claim 22 except to selecting a set of search engine collections based on a service identification added to a search request. This step is said to be obvious based on knowledge of those skilled in the art with the teaching of Chidlovskii. First, though, Chidlovskii fails to teach several of the elements of Claim 22. Claim 22 calls for "modifying the retrieved set of information with the search interface to include service identifications." Chidlovskii fails to teach the concept of populating the search engine collections with modifications to include service identifications (and beginning at col. 2, line 49 discusses what occurs after a search request is received – i.e., after the point at which a search engine collection would be populated). Additionally, Applicant does not agree that it would be obvious to modify Chidlovskii to modify search requests to limit/filter which search engine collections may be searched based on a client search profile. As discussed with reference to Claim 1, Chidlovskii does not teach modifying the search profile so it would not be obvious to add a

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modification step to the teachings of Chidlovskii and, particularly, the modification step called for in Claim 22 useful for filtering which information is accessible by a user based on their profile. Because Chidlovskii fails to suggest at least these two elements, Claim 22 is believed in condition for allowance.
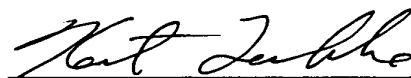
Conclusions

Based on the above remarks, all pending claims are believed to be allowable over the above-discussed references. Consequently, the case is believed to be in condition for allowance, and this action is respectfully requested.

No fees are believed due with this response, but any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,

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